

KEVIN V. RYAN (CSBN 118321)  
United States Attorney

MARK L. KROTOSKI (CSBN 138549)  
Chief, Criminal Division

PETER B. AXELROD (CSBN 190843)  
LAUREL BEELER (CSBN 187656)  
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102  
Telephone: (415) 436-6774  
Facsimile: (415) 436-7234

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 06-0101 CRB
	)	
Plaintiff,	)	
	)	STIPULATION RE: ORDER OF
v.	)	FORFEITURE AND ENTRY OF
	)	FORFEITURE JUDGMENT
YON SUK PANG,	)	
a/k/a Yon S. Pang,	)	
a/k/a Nana,	)	
	)	
Defendant.	)	

The United States of America, by and through Assistant United States Attorneys Peter B. Axelrod and Laurel Beeler, and defendant Yon Suk Pang, by and through her counsel Lawrence Wong and Edward Hung, hereby stipulate and agree to the following:

1. On February 16, 2006, the United States filed an Indictment charging defendant Pang with violations of Title 18, United States Code, Section 371 – Conspiracy; Title 8, United States Code, Section 1328 – Employing Or Harboring Alien For Prostitution; Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) – Conspiracy To Harbor Aliens; Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i) – Alien Harboring For the Purpose Of Commercial Advantage and Private Financial Gain; Title 18, United States Code, Section

1  
2 1956(h) – Conspiracy To Launder Monetary Instruments; Title 18, United States Code, Section  
3 1956(a)(1)(A)(i) – Laundering Of Monetary Instruments; and Title 18, United States Code,  
4 Section 2 – Aiding and Abetting. The indictment also sought criminal forfeiture pursuant to Title  
5 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c),  
6 Title 18, United States Code, Section 982(a)(1) and Title 18, United States Code, Section  
7 982(a)(6)(A).

8 2. On July 5, 2006, defendant Pang pled guilty to two counts of the indictment charging  
9 her with conspiracy to commit alien harboring, in violation of Title 8, United States Code,  
10 Section 1324(a)(1)(A)(v)(I) (count nine), and conspiracy to commit money laundering, in  
11 violation of Title 18, United States Code, Section 1956(h) (count seventeen).

12 3. As set forth in Paragraph 9 of said plea agreement, defendant Pang agreed to forfeit to  
13 the United States \$1,200,000, an amount that represents the value of the proceeds defendant Pang  
14 earned from alien harboring, in violation of Title 8, United States Code, Section  
15 1324(a)(1)(A)(v)(I).

16 4. The parties further stipulate that defendant Pang shall receive an offset from that  
17 \$1,200,000, in the amount of \$86,046 in United States currency recovered from 1030 Baker  
18 Street, San Francisco, California (her residence), on June 30, 2005, which also represents  
19 proceeds of alien harboring. Defendant Pang thus withdraws any claims she may have to the  
20 \$86,046 seized from her residence and consents to the forfeiture of said funds.

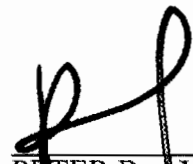
21 5. Accordingly, as a result of the conviction of the offenses set forth above, and pursuant  
22 to Rule 32.2(b) of the Federal Rule of Criminal Procedures and Title 18, United States Code,  
23 Section 982(a)(6)(A), the parties stipulate that the Court should enter a money judgment against  
24 defendant Pang in the amount of \$1,200,000.

25 6. All payments made in satisfaction of this money judgment shall be made payable to  
26 the Department of Homeland Security and delivered to the attention of Peter B. Axelrod,  
27 Assistant United States Attorney, United States Attorneys Office, 450 Golden Gate Avenue, San  
28 Francisco, California 94102, in a time and manner as prescribed by the Court.

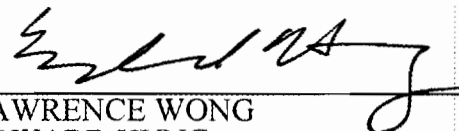
7. Pursuant to Rule 32.2(b)(3), this Order of Forfeiture is final as to the defendant and shall be made part of the sentence and included in the judgment.

8. The Court shall retain jurisdiction to enforce this Order, and to amend it as necessary pursuant to Federal Rules of Criminal Procedure, Section 32.2(e).


Dated: 7/5/06

  
 PETER B. AXELROD  
 LAUREL BEELER  
 Assistant United States Attorneys

Dated: 7/5/06

  
 LAWRENCE WONG  
 EDWARD HUNG  
 Attorneys for Defendant

Dated: July 5, 06

  
 YON SUK PANG  
 Defendant

INTERPRETER CERTIFICATION

I, \_\_\_\_\_, hereby certify that I am a certified \_\_\_\_\_ [language] interpreter and that I accurately translated this Stipulation Re: Order of Forfeiture and Entry of Forfeiture Judgment to the defendant, she told me that she understood it, and I believe her answer was true and correct.

Dated: \_\_\_\_\_

\_\_\_\_\_  
 Interpreter's signature

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ORDER

Based on the above stipulation and good cause appearing therefore, IT IS HEREBY ORDERED THAT:

1. Pursuant to Federal Rule of Criminal Procedure 32.2(b) and Title 18, United States Code, Section 982(a)(6)(A), defendant Pang is hereby ordered to pay a forfeiture money judgment in the amount of \$1,200,000.

2. Defendant Pang shall receive an offset from said \$1,200,000 money judgment, in the amount of \$86,046 in United States currency recovered from 1030 Baker Street, San Francisco, California (her residence), on June 30, 2005, which also represent proceeds of alien harboring.

3. Defendant Pang's claim to \$86,046 in United States currency is hereby withdrawn. All right, title and interest in said \$86,046 in United States currency is condemned and forfeited to the United States.


4. All payments made in satisfaction of this money judgment shall be made payable to the Department of Homeland Security and delivered to the attention of Peter B. Axelrod, Assistant United States Attorney, United States Attorneys Office, 450 Golden Gate Avenue, San Francisco, California 94102, in a time and manner as prescribed by the Court.

5. Pursuant to Rule 32.2(b)(3), this Order of Forfeiture is final as to the defendant and shall be made part of the sentence and included in the judgment.

6. The Court shall retain jurisdiction to enforce this Order, and to amend it as necessary pursuant to Federal Rules of Criminal Procedure, Section 32.2(c).

IT IS SO ORDERED.

Dated: July 5, 2006

  
CHARLES R. BREYER  
United States District Judge